

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>TONYA CLAY, et al.</b>	)	<b>CASE NO. 1:18-CV-02929</b>
	)	
<b>Plaintiffs,</b>	)	<b>JUDGE SOLOMON OLIVER</b>
	)	
<b>vs.</b>	)	
	)	
<b>CUYAHOGA COUNTY, Ohio et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

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**UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME TO ANSWER, MOVE,  
OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT**

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Defendants Cuyahoga County, Armond Buddish, Clifford Pinkney, George Taylor, Brandy Carney, and Eric J. Ivey ("County Defendants") as well as the MetroHealth System and Dr. Thomas Tallman ("MetroHealth Defendants") jointly move this Court for an extension of time to February 22, 2019, to answer, move, or otherwise respond to Plaintiff's class action Complaint. The current deadline is February 1, 2019. The reason for this request: the parties are engaged in discussions to determine whether a more expeditious resolution of this matter is possible short of costly and protracted litigation.<sup>1</sup> Rather than spend their time litigating this matter and submitting adversarial pleadings and motions, the parties desire to focus their efforts on a possible resolution. Plaintiffs' counsel has been contacted regarding this request and have no opposition to an extension to February 22, 2019.

Accordingly, Defendants respectfully request an Order granting them an extension of time until **February 22, 2019** to answer, move, or otherwise respond to Plaintiffs' class action Complaint. This request is submitted in good faith and not for purposes of delay.

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<sup>1</sup> The parties met on January 24, 2019, and plan to meet again on February 15, 2019.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2019, a copy of the foregoing Joint Motion for Extension of Time to Answer, Move, or Otherwise Respond to Plaintiffs' Complaint was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Brendan D. Healy

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